

MARK BRNOVICH  
Attorney General  
Firm Bar No. 14000

EVAN MALADY  
State Bar No. 033987  
Assistant Attorney General  
2005 N. Central Avenue  
Phoenix, Arizona 85004-1592  
Telephone 602.542.7996  
crmfraud@azag.gov

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

**PAUL D. PETERSEN (001),**  
(Counts 1-32)

and

**LYNWOOD JENNET (002),**  
(Counts 1-32)

Defendants.

Case No:

**85 SGJ 77**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. §§ 13-1003, 13-1802 and 13-2310

**COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310

**COUNT 3: THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802

**COUNTS 4-31: FRAUDULENT SCHEMES AND PRACTICES**, Class 5 Felonies, in violation of A.R.S. § 13-2311

**COUNT 32: FORGERY**, a Class 4 Felony, in violation of A.R.S. § 13-2002

The Arizona State Grand Jury accuses, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, charging on this 7th day of October, 2019 that in or from Maricopa County, Arizona:

**COUNT 1**  
**CONSPIRACY**

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, conspired to commit: Fraudulent Schemes and Artifices, Theft, and Fraudulent Schemes and Practices, in violation of A.R.S. §§ 13-1003, 13-2310, 13-2311, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

Said offense occurred when on or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, with intent to promote or aid the commission of an offense(s), to wit: Fraudulent Schemes and Artifices, Theft, and Fraudulent Schemes and Practices, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense, and one of the persons committed an overt act in furtherance of the conspiracy to wit: submitting false applications to the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM to obtain benefits, in violation of A.R.S. §§ 13-1003, 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

**COUNT 2**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained services provided by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM by means of fraudulent representations, TO WIT: **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)** facilitated travel for pregnant women from the Republic of the Marshall Islands (hereinafter, “RMI”) to come to Arizona for the purpose of giving a child up for adoption. After the birth of the child,

**PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)** facilitated travel for these women to leave Arizona. In several instances the women returned directly to the RMI.

In 1983, the United States entered into a Compact of Free Association (hereinafter, the “Compact”) with the RMI government. The United States and the RMI signed an Amended Compact in 2003. Section §141 of the Compact grants RMI citizens the ability to freely enter, and take up employment within the United States. Section §141(b) prohibits RMI citizens from entering the United States under the Compact agreement if their travel is for the purpose of adoption. In pertinent part, the Compact states, “(b) Notwithstanding subsection (a) of this section, a person who is coming to the United States pursuant to an adoption outside the United States, or of adoption in the United States, is ineligible for admission under the Compact and the Compact as amended.” The scheme in this case fraudulently represented the pregnant women in question were residents of Arizona in order to obtain medical services by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM because without residency ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM services cannot be obtained. This fraudulent scheme is in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 3**

**THEFT**

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, diverted another’s services, TO WIT: ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, to the person’s own or another’s benefit without authority to do so, in violation of A.R.S. §§ 13-1801, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 4**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about December 12, 2016, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for E.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 5**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 18, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 6**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about October 30, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for K.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 7**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about December 04, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for S.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 8**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about December 09, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 9**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 09, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for L.L. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 10**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 11, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for H.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 11**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 17, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for C.L. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 12**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.N. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 13**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about January 26, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.B. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 14**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about February 05, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for N.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 15**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about April 27, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.S. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 16**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about April 27, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.A. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 17**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about May 7, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for L.C. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 18**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about May 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for E.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 19**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about May 23, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for S.N. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 20**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for T.H. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 21**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 22**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for K.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 23**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about July 12, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for W.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 24**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about August 1, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.S. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 25**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about August 28, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for H.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 26**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about October 19, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.D. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 27**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about March 11, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.T. stating she is an Arizona Resident t, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 28**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about March 20, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for H.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 29**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about April 03, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for V.P. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 30**

**FRAUDULENT SCHEMES AND PRACTICES**

On or about April 08, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.H. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 31**  
**FRAUDULENT SCHEMES AND PRACTICES**

On or about May 29, 2019, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.A. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 32**  
**FORGERY**

On or about February 13, 2019, **PAUL D. PETERSEN (001)** and **LYNWOOD JENNET (002)**, with the intent to defraud, offers or presents a forged instrument or one that contains false information, TO WIT: Christyann Talley's State residency document written by Lynnwood Jennet, in violation of A.R.S. §§ 13-2002, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

---

(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated:

---

---

EVAN MALADY  
Assistant Attorney General

---

Foreperson of the State Grand Jury

#8248587